

June 1, 2004

Docket Management Facility
US Department of Transportation
400 Seventh St. SW
Nassif Building, Room PL 401
Washington, DC 20590-0001

RE: Docket # NHTSA-04-17326

Dear Sir or Madam:

The State of Washington Department of Licensing (WADOL) has reviewed the Notice of proposed Rulemaking (NPRM), "Procedures for Participating and Receiving Data from the National Driver Register Problem Driver Pointer System," issued March 31, 2004.

WADOL currently supports and uses the Commercial Driver License Information System (CDLIS) and the National Driver Register/Problem Driver Pointer System (NDR/PDPS) for the following license purposes:

- All new applicants for a Washington driver license. Washington state law prohibits the issuance of a driver license to any individual whose driving privilege is suspended, revoked, cancelled or denied by any US state, territory or possession. The NDR/PDPS inquiry enables WADOL to comply with this requirement.
- NDR/PDPS and CDLIS for all commercial drivers. The NDR/PDPS check guarantees that the commercial license applicant is not suspended, revoked, cancelled or denied by any US state, ~~territory or possession~~. The CDLIS check ensures the applicant does not currently have a commercial license in any other jurisdiction. Currently all states are required to collect the Social Security Number or a jurisdictional unique identifier of all CDL applicants. This ensures that each CDL record is associated with one specific driver ~~has a unique identifier~~. This unique identifier ensures that identity issues are easily resolved for applicants who have common names. Currently the NDR/PDPS system does not require a Social Security Number and relies on possible matches based on similar names and similar dates of birth. Drivers with common names have many possible matches with individuals with other drivers who share the same or similar names or date of birth.

Although WADOL supports the provisions of this proposed rule we do have the following concerns:

- Currently the NDR/PDPS system does not require a Social Security Number and relies on possible matches based on similar names and similar dates of birth. Drivers with common names have many possible matches with individuals with other drivers who share the same or similar names or date of birth. Without the SSN, states are frequently forced to require noncommercial license applicants to prove they are not the person who shares the same, or similar, name and date of birth. Resolutions of these issues require manual intervention and research, which would affect customer wait times in our Licensing Service Offices.

- The increase in NDR/PDPS inquiries could significantly increase the customer service and wait time, due to the significant increase in the number of inquiries. Currently we are sending one message every 2 seconds over AAMVANET. Once this change is online WADOL is estimating a scenario of 100,000 messages a day to and from AAMVA. This will be just under 4 messages a second. We should see an increase in response time from 1.910 seconds to 3.363 seconds. While this is a seemingly small difference of 1.45 seconds per transaction, that is only on the first 17,000 messages. We still need to address the additional 93,000 messages per day at 3.363 seconds. This is an estimate, however WADOL initial estimates for the AAMVA Bridge usage were around 12,000 messages a day and currently we are averaging 17,000 messages per day.
- Here are the performance Benchmarks.

MQSeries Stress Testing Benchmarks						
Message Count	Loop Count	Round Trips to the Unisys	Messages Count	Total Test Time (Seconds)	Messages Per Second	Average Response Time (Seconds)
1	2	2	4	3.89	1.03	1.918
3	2	6	12	4.78	2.51	2.221
5	2	10	20	7.56	2.65	3.363
10	2	20	40	15.31	2.61	6.462
15	2	30	60	22.34	2.63	9.332
20	2	40	80	30.92	2.59	12.672
25	2	50	100	40	2.5	16.376

- The **CDLIS** and **NDR/PDPS** systems are not operated **24/7** and this change in requirement would affect our ability to offer services over the Internet, which could increase the number of customers who would be coming into our Licensing Service Offices (LSO's). **CDLIS and NDR/PDPS are unavailable from 3am to 4am (ET) daily. NDR/PDPS shuts down at 3am (ET) on Sunday's and resumes at 4am on Monday's (ET).**
- Programming changes will be extensive and costly. This required regulation change will require programming logic changes for our in house, on-line and the Driver Field System (DFS) issuance software to allow inquires on all license applications. WADOL is estimating 800 hours of programming time to facilitate this proposed change.
- The increase in inquiries would seriously degrade service time over our Local Area Network (LAN) requiring either an expensive upgrade to our Frame Relay Network to increase bandwidth or an increase to customer service and wait time.

- For these reasons, WADOL feels that NHTSA should have submitted the proposed rule to the Office of Management and Budget (OMB), because this regulatory action does have a significant impact on the states.
- In addition, the WADOL is currently in the process of updating our database from a 1970's legacy system to a server based .NET system. This will require an extensive period of code freeze to make this change successful. Therefore we are asking for the proposed implementation date of this rule change is no earlier than **January 1, 2006**.

Thank you for this opportunity to offer comment.

Sincerely,

Denise Movius
Assistant Director
Washington State Department of Licensing